REMARKS

Claims 1-113 were pending as of the action mailed on January 16, 2008.

Claims 1-21 and 54-81 were elected in a reply filed December 10, 2007, to a restriction requirement mailed November 26, 2007. Claims 22-53 and 82-113 were withdrawn from further consideration.

Claims 1, 54, and 61 are in independent form. Claims 1, 54, and 61-81 are being amended. No claims are being newly added. No new matter has been added. Support for the amendments to claims 1, 54, and 61 can be found within the applicant's specification at least at page 13, lines 19-21 and page 52, lines 25-29.

Reconsideration of the action is respectfully requested in light of the foregoing amendments and the following remarks.

Interview Summaries

The applicant thanks Examiners Fujita and Kassa for the courtesy of the in-person interview on January 24, 2008. The time spent with the applicant's representatives Hans R. Troesch and Arriènne M. Lezak was greatly appreciated. During the interview, aspects of the applicant's specification were discussed.

The applicant thanks Examiners Fujita and Bali for the courtesy of the in-person interview on April 8, 2008. The time the examiners spent with the applicant's representatives Brian J. Gustafson and Arriènne M. Lezak was greatly appreciated. During the interview, the claims were discussed in light of the prior art. Recommendations made by the examiners have been incorporated into the claims as noted above.

Specification

On page 2 of the Office Action mailed January 16, 2008, the examiner objected to the specification. Specifically, the examiner indicated that the wording " 'What is claimed is:' should be removed from the specification and placed in the first line of the claims." The

applicant respectfully disagrees with the examiner's objection. However, in order to expedite prosecution, the applicant has amended the specification in accordance with the examiner recommendation.

Withdrawal of the objection to the specification is therefore respectfully requested.

Section 101 Rejections

Claims 61-81 were rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. To expedite prosecution, claims 61-81 have been amended to recite "a computer-program product, tangibly embodied in a machine-readable storage device…".

Withdrawal of the rejection under 35 U.S.C. § 101 is therefore respectfully requested.

Section 103 Rejections

Claims 1-6, 9-13, 15, 61-66, 69-73, and 75 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over U.S. Patent No. 5,701,367 ("Koshi").

Claims 7, 8, 67, and 68 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Koshi in view of U.S. Patent No. 6,272,235 ("Bacus").

Claims 16-19 and 76-79 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Koshi in view of U.S. Patent No. 6,215,820 ("Bagni").

Claims 14, 20, 21, 74, 80, and 81 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Koshi in view of U.S. Patent No. 6,704,358 ("Li").

Claims 54-60 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Koshi in view of U.S. Patent No. 6,072,479 ("Ogawa").

Claim 1

To expedite prosecution, and without changing the scope of the claim, claim 1 has been amended to recite identifying code values of an input representation of the received digital data, the code values having variable bit widths and representing data values for one or more

representation components, <u>where a bit width of a particular data value identifies a number of valuable bits in the data value</u>.

On page 5 of the office action mailed January 16, 2008, the examiner relies upon Koshi to reject the portion of the claim limitation reciting "identifying code values of an input representation of the received digital data, the code values having variable bit widths and representing data values for one or more representation components."

Specifically, the examiner asserts:

> "identifying code values (figure 12, numeral 113) of an input representation of the received digital data (figure 12, numeral 16), the code values having variable bit widths (figure 11, numeral 105) and representing data values for one or more representation components (figure 11, numeral 103; "transform coefficient" at col. 2, line 54);"

FIGS. 11 displays the following:
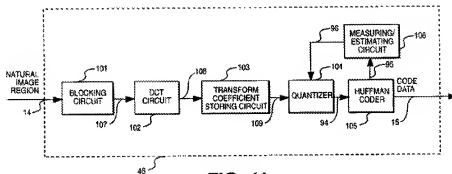
FIG. 11

Specifically, the examiner cites FIG. 11, numeral 105 as teaching code values having variable bit widths. FIG. 11, numeral 105 indicates the presence of a Huffman Coder. The applicant respectfully submits that teaching Huffman coding is different from teaching a variable bit width where a bit width refers to the number of valuable bits in a data value. Additionally, the applicant's specification notes that "in Huffman encoding, code values having small lengths are associated with data values that have a

high frequency of occurrence in the digital data, and code values having large lengths are associated with data values that have a low frequency of occurrence in the digital data."

More specifically, Huffman coding requires the use of a variable-length code table for encoding a source symbol (such as a character in a file), where the variable-length code table has been derived in a particular way based on the estimated probability of occurrence for each possible value of the source symbol. Thus, the applicant respectfully submits that Huffman coding teaches an association between the size of a code value and its frequency of occurrence in the digital data.

The applicant's claims, as amended, require code values having variable bit widths and representing data values for one or more representation components where a bit width of a particular data value identifies a number of valuable bits in the data value. Thus the applicant's claims require a bit width that refers to the number of valuable bits in a data value. As noted above, Koshi teaches Huffman coding, or an association between the size of a code value and its frequency of occurrence in the digital data. The applicant respectfully submits that Huffman coding is not based upon the significance of valuable bits.

Moreover, claim 1 recites generating a first bit width distribution that defines a respective frequency of occurrence for two or more different bit widths based on bit widths of data values for that representation component in the input representation. Since Koshi does not teach bit width determinations based upon the significance of the valuable bits, Koshi can not teach a bit width distribution based on these bit width determinations.

Therefore, the applicant submits that Koshi does not teach or suggest code values having variable bit widths and representing data values for one or more representation components where a bit width of a particular data value identifies a number of valuable bits in the data value. Additionally, the applicant submits that Koshi does not teach or suggest generating a first bit width distribution that defines a respective frequency of occurrence for two or more different bit widths based on bit widths of data values for that representation component in the input representation. As Koshi does not teach or suggest

each and every limitation recited in claim 1, the applicant respectfully submits that claim
1 is allowable.

Claims 54 and 61

Claims 54 and 61 includes features corresponding to those of claim 1 and were rejected
for the same reasons. Therefore, the applicant respectfully submits that claims 54 and 61 are
allowable for at least the reasons set forth above with respect to claim 1.

Remaining Claims

The remaining claims depend from independent claims 1, 54, and 61. Specifically,
claims 2-21 depend from claim 1, claims 55-60 depend from claim 54, and claims 62-81 depend
from claim 61. Thus, claims 2-21, 55-60, and 62-81 are allowable for at least those reasons
noted above with respect to independent claims 1, 54, and 61.

Withdrawal of the rejection under 35 U.S.C. § 103(a) is therefore respectfully requested.

Conclusion

The applicant respectfully requests that all pending claims be allowed.

By responding in the foregoing remarks only to particular positions taken by the
examiner, the applicant does not acquiesce with other positions that have not been explicitly
addressed. In addition, the applicant's selecting some particular arguments for the patentability
of a claim should not be understood as implying that no other reasons for the patentability of that
claim exist. Finally, the applicant's decision to amend or cancel any claim should not be
understood as implying that the applicant agrees with any positions taken by the examiner with
respect to that claim or other claims.

Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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